

DOCKET FILE COPY ORIGINAL

# COMMSOUTH Media Associates

4001 Highway 78 East - Jasper, AL 35501 (205) 384-4656

March 8, 1994

Mr. William F. Caton, Secretary  
Federal Communications Commission  
1919 M Street, N.W. - Room 222  
Washington, D.C. 20554

RECEIVED  
MAR 15 1994  
FCC MAIL ROOM

Re: Petition to Amend FM Table of Assignments 73.202(b)  
Idex, Alabama  
Channel 254A

Dear Mr. Caton:

Pursuant to Section 1.401 of the Federal Communications Commission's Rules, please find enclosed an original and four copies of the above styled Petition for Rulemaking on behalf of Deborah M. Thompson.

Please don't hesitate to call me should you have any questions or concerns about this matter.

Sincerely,



Kirk A. Tollett  
Consultant to Deborah M. Thompson

No. of Copies rec'd  
List ABCDE

7-11  
AMB

HE

MAR 15 1994

FCC MAIL

RM-8423

**Prepared by:**  
**Kirk A. Tollett**  
**Commsouth Media**  
**Associates**  
**4001 Highway 78 East**  
**Jasper, AL 35501**

**Prepared for:**  
**Deborah M. Thompson**  
**Route 5, Box 881**  
**Scottsboro, AL 35768**

**Petition For Rulemaking**

**Idler, Alabama**

**March 8, 1994**

RECEIVED

MAR 15 1996

FCC MAIL ROOM

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
 )  
Amendment of Section 73.202 (b) ) Docket No.  
Table of Assignments, ) RM - 8453  
FM Broadcast Stations )  
Idier, Alabama )

To: Chief, Policy and Rules Division

**PETITION FOR RULEMAKING**

Deborah M. Thompson, (hereinafter "Petitioner"), pursuant to Section 1.401 of the Commission's Rules, respectfully petitions the Commission to institute a rulemaking proceeding looking toward the assignment of FM Channel 254A to Idier, Alabama, and to amend Section 73.202(b) of the Commission's Rules as follows:

City	Channel Number	
	Present	Proposed
Idier, Alabama		254A

In support whereof the following is shown:

1. As reflected in the attached technical exhibit, prepared by Commsouth Media Associates, the requested assignment of FM Channel 254A at Idier, Alabama, can be made in full compliance with all applicable minimum mileage separations and other technical requirements under the Commission's Rules. Further, Channel 254A can be assigned to Idier, Alabama without any other changes in the Table of Assignments.

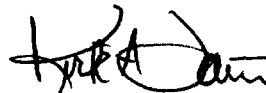
2. Bridgeport, Alabama is an incorporated town located at the north eastern corner of De Kalb County. 1990 U.S. Census figures for the of the Town of Ider was 671 persons. The 1990 Census figures for De Kalb County were 54,651.

3. It is the long standing policy of the Commission as mandated by Congress to allow the most efficient use of available spectrum in order to advance the public interest, convenience, and necessity. There is no FM broadcast facility currently licensed to Ider, Alabama. Therefore, if adopted this proposal would provide first local service to the community of Ider, Alabama.

4. As can be ascertained from the attached declaration, if Channel 254A is allocated to Ider, Alabama, petitioner will promptly apply for a construction permit for the new FM broadcast station, and if a construction permit is granted, petitioner will promptly construct and operate the station for which she is licensed.

WHEREFORE, for the foregoing reasons, the Commission should amend Section 73.202(b) of its Rules by allocating FM Channel 254A to Ider, Alabama.

Respectfully Submitted,



Kirk A. Tollett

Consultant to Deborah M. Thompson

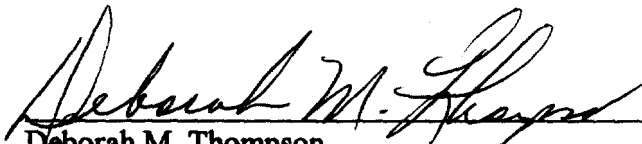
Commsouth Media Associates  
4001 Highway 78 East  
Jasper, AL 35501  
(205)384-4656  
March 7, 1994

## DECLARATION

I, Deborah M. Thompson, hereby certify that:

1. That I am a citizen of the United States and of the State of Alabama.
2. I am a petitioner requesting the Federal Communications Commission institute the appropriate Rulemaking to allocate FM Radio Channel 254A (98.7 MHz) to the Town of Ider, Alabama.
3. I have retained Kirk A. Tollett and Commsouth Media Associates to assist me in the preparation and filing of the required technical exhibits to facilitate the afore mentioned rulemaking.
4. If FM Channel 254A or an equivalent channel is allocated to Ider, Alabama, I will promptly apply; either individually or as an entity of which I am a part, for a construction permit to operate the new FM broadcast station. If a construction permit is granted, I or an entity of which I am a part, will promptly construct and operate the station for which I am licensed.

I hereby certify under penalty of perjury that the above statement is true.  
Signed and dated this 10th day of March, 1994



Deborah M. Thompson  
Petitioner  
Route 5 Box 88I  
Scottsboro, Alabama 35768

---

# **E X H I B I T E**

**Prepared by:**  
**Kirk A. Tollett**  
**Commsouth Media**  
**Associates**  
**4001 Highway 78 East**  
**Jasper, AL 35501**

**Prepared for:**  
**Deborah M. Thompson**  
**Route 5 Box 881**  
**Scottsboro, Alabama 35768**

---

**Petition For Rulemaking**

---

**Idler, Alabama**

---

**March 7, 1993**

---

---

# **E X H I B I T E**

---

## **ENGINEERING STATEMENT**

**Deborah M. Thompson**

**Ider, Alabama**

**March, 1994**

### **INTRODUCTION**

This engineering exhibit has been prepared on behalf of Deborah M. Thompson, in support of a Petition for Rulemaking, requesting a change in the FM Table of Assignments, Paragraph 73.202(b) of the FCC Rules as follows:

---

Location	Present	Proposed
Ider, Alabama	None	254A

---

As can be gleaned from the attached exhibits, Channel 254A can be added to the Federal Communications Commission Table of Assignments with out the necessity of any other changes and without the creation of any new preclusion area.

### **DISCUSSION**

Figure 1 is a full scale reproduction of a portion of a NOAA 1:500,000 sectional aeronautical map entitled "Atlanta". Upon it has been superimposed a cross mark which represents the reference coordinates utilized in the preparation of this Report. The geographic coordinates selected for this study were:

N 34° 48' 35"

W 85° 36' 25"

This site is located approximately 12.3 kilometers northeast of Ider, Alabama.

Figure 1, details the area of Ider and the pertinent arcs from all co-channel as well as adjacent channel facilities, allocated, assigned or operational within 200 miles of the proposed allocation. It is believed that there is ample clearance to locate a tower site that would place the required unobstructed city grade signal, (70 dBu), over the entire City of Ider.

Figure 2, is a computer generated allocation study using the Commission's specified method of distance computations, demonstrating the assignability of FM Channel 254A to Ider, Alabama. The information contained in Figure 2, was utilized in preparation of the pertinent arcs contained in Figure 1.

### **CONCLUSION**

Based on this information, and the figures that are included in this Report, we believe that the proposed assignment would be in full compliance with the Federal Communications Commission's Rules, and that Channel 254A could be assigned to Ider, Alabama as that communities first local broadcast service.

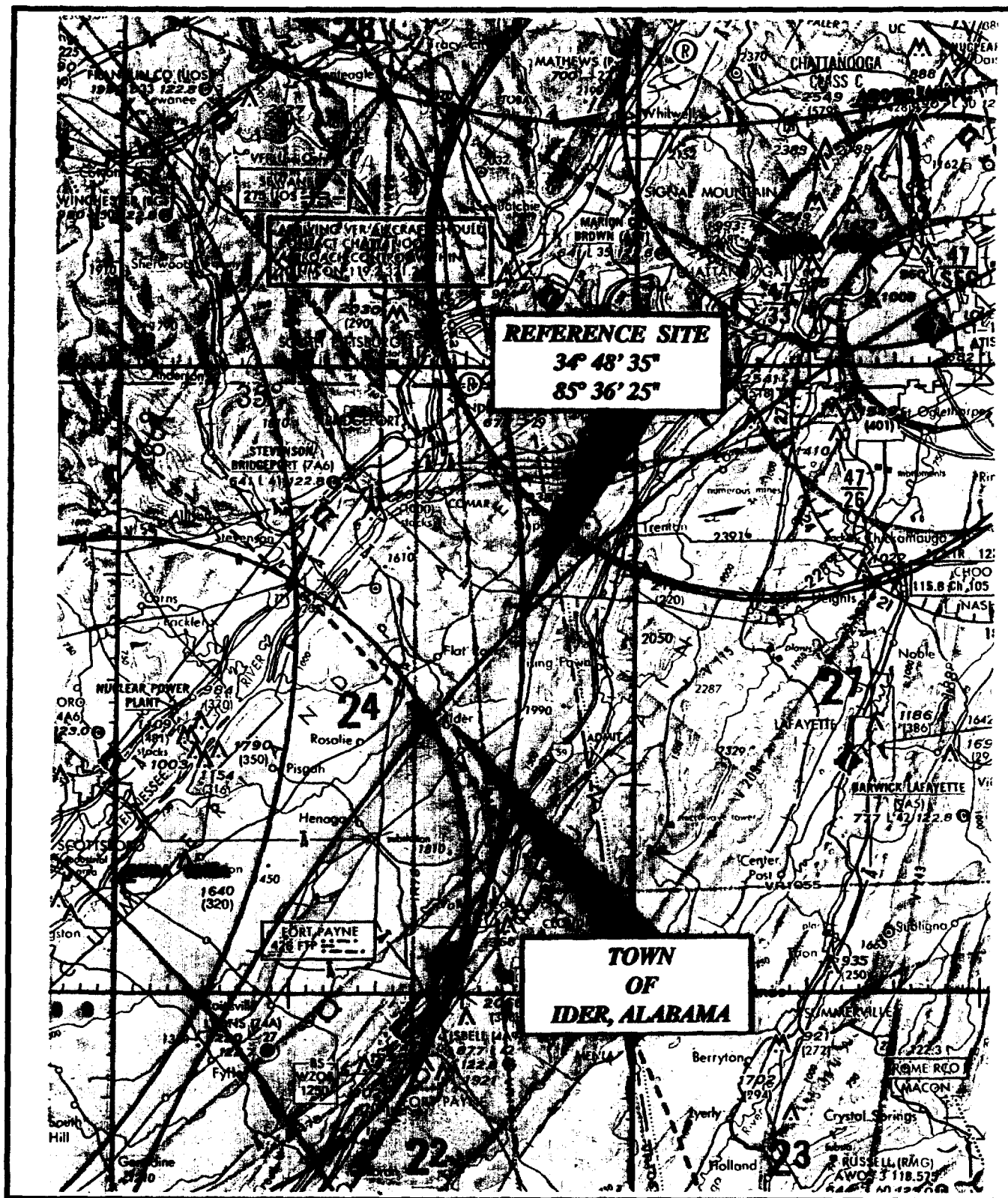
Therefore, Deborah M. Thompson, respectfully requests amendment of the Commission's Table of Assignments, Section 73.202(b), and will promptly apply for a construction permit, should the Federal Communications Commission make the requested assignment.

Respectfully,

Kirk A. Tollett

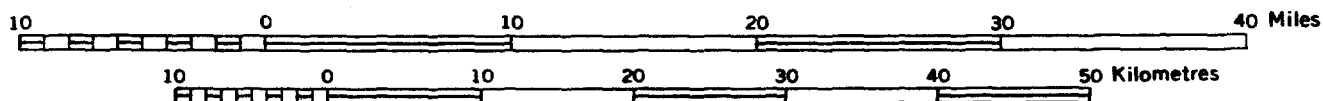
March 7, 1994





Scale 1:500,000

1 inch equals approximately 8 miles



**FIGURE 2**  
**FM SEPARATION STUDY**  
**DEBORAH M. THOMPSON**  
**NEW-FM CHANNEL 254A,**  
**IDER, ALABAMA**

#	CALL	CHAN	CL	S	KM.	SEP	BEAR	ERP	AMSL	CITY	ST
01	W251AC	251	D	L	103.5	0	270.5°	0.010	412	Capshaw	AL
02	WVXA	251	A	C	38.0	31	35.8°	1.000	582	Signal Mou	TN
03	WKEAFM	252	A	L	42.9	31	235.3°	2.350	466	Scottsboro	AL
04	WDEHFM	252	A	L	137.4	31	49.5°	2.800	346	Sweetwater	TN
05	WDEHFM	252	A	A	137.4	31	49.5°	6.000	345	Sweetwater	TN
06	WDEHFM	252	A	A	140.6	31	52.8°	1.850	480	Sweetwater	TN
07	WINJ	252	A	L	140.6	31	285.4°	3.000	347	Pulaski	TN
08	WINJ	252	A	A	140.6	31	285.4°	6.000	340	Pulaski	TN
09	WSBFM	253	C	L	165.2	165	134.8°	100.000	592	Atlanta	GA
10	WHUBFM	253	C2	L	148.4	106	4.9°	50.000	499	Cookeville	TN
11	WLBI	254	A	C	159.0	115	226.3°	6.000	254	Warrior	AL
12	WHOPFM	254	C1	L	287.2	200	323.2°	100.000	248	Hopkinsvil	KY
13	WXVO	254	A	L	176.2	115	40.1°	6.000	463	Oliver Spr	TN
14	WBAMFM	255	C	L	272.5	165	191.6°	100.000	397	Montgomery	AL
15	WQMT	255	A	L	80.2	72	94.1°	3.000	430	Chatsworth	GA
16	WQMT	255	A	C	82.2	72	95.2°	0.950	623	Chatsworth	GA
17	WANT	255	A	C	166.2	72	338.9°	5.000	287	Lebanon	TN
18	WAHR	256	C	L	94.5	94	269.2°	100.000	538	Huntsville	AL
19	W257AZ	257	D	C	32.7	0	47.4°	0.250	665	Lookout Mo	TN